

From: [Megan Lawson](#)
To: [Gungle, Ashley](#)
Cc: [Hingtgen, Robert J.](#); [Patrick BROWN \(Patrick.BROWN@soitec.com\)](#) ([Patrick.BROWN@soitec.com](#))
Subject: RE: Soitec follow up
Date: Friday, October 04, 2013 2:34:46 PM
Attachments: [image001.png](#)
[CA CREZ Conceptual Transmission Segments Phase 2B final.pdf](#)

Ashley,

Here is our response to Mr. Silver's e-mail:

Mr. Silver references "Competitive Renewable Energy Zones" (CREZs), which were part of the California Energy Commission's (CEC) "Renewable Energy Transmission Initiative" (RETI) between 2008 and 2011. From what we can tell, the CEC's RETI process appears to have stalled in early 2011, and now appears to have been set aside by the Desert Renewable Energy Conservation Plan (DRECP) process.

<http://www.energy.ca.gov/reti/>. As you know, we do not need to address the DRECP in the PEIR because the project areas are located entirely outside of the DRECP area.

For the County's reference, the RETI process identified necessary major updates to the California transmission system to access CREZs. The process identified CREZs that could be developed in the most cost effective and environmentally benign manner. Potential renewable energy projects were grouped into CREZs based on geographic proximity. The CREZ implicated in southern San Diego County is CREZ 27, San Diego South. Each CREZ was developed based on existing and proposed projects (e.g., those projects with a PPA, or PPA pending) and other projects or resources with a high potential of being developed. Because the Soitec projects were not yet proposed at the time of CREZ development (2008-2010), Soitec's projects were not accounted for in the CREZ, nor does CREZ 27 account for areas of high solar potential or the most cost-effective or environmentally-benign sites for future solar development.

Contrary to Mr. Silver's suggestion, whether Soitec's projects are in a CREZ or not does not "provide a presumption, at least, as to whether the project is appropriately sited or whether the presumption is in favor of an alternative site (that might not be pristine habitat in the East County MSCP preserve planning area)." The results of the RETI process were designed to pinpoint transmission projects that should be developed to connect renewable energy resources located in remote locations to the transmission grid, in order to ensure proposed projects could come online and help meet the state's 33% RPS goal. To that end, the economic and environmental implications of proposed renewable energy projects and necessary transmission corridors was taken into account in ranking proposed conceptual transmission segments. RETI did not broadly evaluate areas outside of proposed project sites and potential sites, like federal energy lease areas, to determine their value for future renewable energy development, such as other areas' proximity to transmission, energy resource potential, or environmental sensitivity.

Nevertheless, Soitec's proposed projects are complimentary to RETI's CREZ and conceptual transmission corridors for southern San Diego, as Soitec's project areas are located partially within CREZs, as Dudek's mapping shows, and are proximate to existing transmission. Furthermore, due to the careful siting of Soitec's projects, even when they are not fully located within a CREZ they are nevertheless environmentally benign, as they are not located within any identified sensitive environmental areas, such as those delineated on the CREZ maps as areas of critical environmental concern, potential desert wilderness, citizen's wilderness inventory, Mohave ground squirrel range or core population, sensitive cultural resource areas, wildlife linkages, proposed desert protection, proposed national monument, or wildlands conservancy.

Map of CREZ's compared to Soitec project areas. Green = CREZ 2A; Blue = CREZ 2B



Attached is the CREZ map from Phase 2B which shows sensitive environmental areas.

Please let us know if you have any additional questions.

Thanks,
Megan

Megan Lawson, LEED AP ND
760.479.4243

-----Original Message-----

From: Gungle, Ashley [mailto:Ashley.Gungle@sdcounty.ca.gov]
Sent: Wednesday, October 02, 2013 8:30 AM
To: Megan Lawson
Cc: Hingtgen, Robert J
Subject: FW: Soitech follow up

Hi Megan,

Dan Silver with the Endangered Habitat League (EHL) provided us with the following information on CREZ zones. Do you have any information on CREZ zone and whether they are applicable to San Diego? If not, can you please research this and determine if it is something we need to address further?

Thanks,

Ashley

-----Original Message-----

From: Dan Silver [mailto:dsilverla@me.com]
Sent: Tuesday, October 01, 2013 12:46 PM
To: Fogg, Mindy; Hingtgen, Robert J; Gungle, Ashley
Subject: Soitech follow up

Dear Mindy, Robert, and Ashley

Thank you again for your time.

After talking to an expert on distributed energy, I am more fully cognizant of the complexities in terms of energy policy and economics. The goal for everyone would be, of course, to have a systematic approach in place rather than a piecemeal, project-by-project process. To that end, I understand that the State has done some prioritization work, identifying locations with good economics for renewable energy but also with lower environmental cost. These are called CREZ zones. If these zones are in place in San Diego, it might provide a presumption, at least, as to whether the project is appropriately sited or whether the presumption is in favor of an alternative site (that might not be pristine habitat in the East County MSCP preserve planning area). I'm not sure the links I was able to quickly locate are of much value, but I provide them for your reference, and maybe the applicant can shed more light.

With best regards
Dan

<http://www.energy.ca.gov/reti/>

<http://www.nationalwind.org/assets/blog/AnneGillette.pdf>

http://www.energy.ca.gov/reti/documents/phase2B/Southern%20CA_CREZ_Conceptual_Transmission_Segments_New_and_Existing_Corridors.pdf

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Renewable Energy Transmission Initiative (RETI)
Phase 2B Maps

California
Proposed Competitive Renewable Energy Zones,
2010 Proposed California Desert Protection Act
& Conceptual Transmission Segments
- New and Existing Corridors
Corrected 7/1/2010

Prepared by the California Energy Commission
Cartography Unit for the RETI Stakeholders
Cartographers - Jacque Gilbreath, Terry Rose & Michael Snyder



BLM Area of Critical Environmental Concern Reference Table		
Alton Canyon	1	Isnpah DWA
Alton Slides	2	Jawbone/Butterbrett
Alligator Rock	3	Jenny Creek
Amargosa River	4	Joaquin Rocks
Amboy Crater	5	Johnson Canyon
Ash Valley	6	Juniper Flats
Bailey Serpentine	7	Kelso Creek/Monkeyflower
Baker Cypress	8	Kettleman Hills
Barstow Woolly Sunflower	9	Krynos Peak
Bedrock Spring	10	Kingston Range
Bendires Thrasher	11	Knockville
Big Morongo Canyon	12	Kuchama
Biglow Cholla	13	Lacks Creek
Black Forest	14	Lake Calhulla - A
Black Mountain	15	Lake Calhulla - B
Blue Ridge	16	Lake Calhulla - C
Bodie Bowl	17	Lake Calhulla - D
Butte Creek	18	Last Chance Canyon
Cache Creek Corridor	19	Limestone Salamander
Calico Early Man Site	20	Lidern
Carbonate Endemic Plants	21	Lost Valley
Carizzo Plain	22	Manila Dunes
Casa Mountain	23	Manix
Cedar Canyon	24	Marble Mountain Fossil Bed
Cedar Roughs	25	Matine Beach
Cedar	26	Merced River
Cerro Gordo	27	Mesquite Hill/Cruero
Chemehuevi DWA	28	Mesquite Lake
Chico Martinez	29	Middle Knob
Christmas Canyon	30	Mill Creek
Chuckwalla DWA	31	Million Dollar Spring
Chuckwalla Valley Dune Thicket	32	Mojave Fishhook Cactus
Clark Mountain	33	Mojave Fringe-toed Lizard
Clear Creek Serpentine	34	Mojave Monkeyflower
Clear Creek/Sacramento River Island	35	Mopah Spring
Coachella Valley Fringe-toed Lizard	36	Mount Dome
Conway Summit	37	Mountain Pass Dinosaur Trackway
Coolidge Mesa	38	Mountain Peaks
Corn Springs	39	Mule Mountains
Cosumnes Canyon	40	Northern California Chaparral
Coyote Mountains Fossil Site	41	Old Growth Juniper
Crater Mountain	42	North Fork Cosumnes River
Crossed Basin	43	Northern California Chaparral
Cypress Mountain	44	Old Growth Juniper
Deadmans Flat	45	Old-Bodman DWA
Deer Creek	46	Palen Dry Lake
Denning Springs	47	Pancho/Coalinga
Desert Lily Preserve	48	Parish's Phacelia
Desert Tortoise Natural Area	49	Patton's Iron Mountain Divisional Camp
Don Palms	50	Pilot Knob
Dutch Flat/Indian Hill RNA	51	Pine Dunes
East Lake Basin	52	Pine Dunes
East Mesa	53	Pinto Mountains DWA
Elder Creek	54	Pisgah
Emigrant Trails	55	Pulte Cypress
Fish Slough	56	Plute-Fenner DWA
Fort Ord Public Lands	57	Plunk Road
Fossil Falls	58	Point Sal
Fremont-Kramer DWA	59	Potrero
Gilman Buttes	60	Rainbow Basin/Owl Canyon
Great Falls Basin	61	Red Hills
Halloran Wash	62	Red Hills Additions
Harper Dry Lake	63	Red Mountain
Haves Corner	64	Red Mountain Spring
Horse Canyon	65	Rodman Mountains Cultural Area
In-Ko-Pah National Monument	66	Rose Spring
Indian Pass	67	Sacramento River/Bend Area
Indian Valley	68	Salinas River
Iron Mountain	69	Saline Valley
Iron Mountain Addition	70	Salt Creek Hills
Iron Mountain Ecological Reserve	71	San Sebastian Marsh/San Felipe Creek
Jones Valley	72	Santa Ana River Wash
Jones Valley	73	Santa Ana River Wash
Jones Valley	74	Santa Margarita Ecological Reserve
Jones Valley	75	Shadow Valley DWA
Jones Valley	76	Shasta and Klamath Rivers Canyon
Jones Valley	77	Short Canyon
Jones Valley	78	Singer Geoglyphs
Jones Valley	79	Sinkard Valley
Jones Valley	80	Sage Dry Lake/Cosote Rings
Jones Valley	81	South Fork Eel River
Jones Valley	82	Spivey Pond
Jones Valley	83	Starrs
Jones Valley	84	Superior-Cosumnes DWA
Jones Valley	85	Surprise Canyon
Jones Valley	86	Sustan River
Jones Valley	87	Sweeney Drive
Jones Valley	88	Tahle Mountain
Jones Valley	89	Tierra Redonda
Jones Valley	90	Timbered Center WSA
Jones Valley	91	Tortevine Hot Springs
Jones Valley	92	Turtle Mountains
Jones Valley	93	Upper Johnson Valley Yucca Rings
Jones Valley	94	Warm Sulphur Springs
Jones Valley	95	West Mesa
Jones Valley	96	West Paradise
Jones Valley	97	Western Rand Mountain Expansion
Jones Valley	98	Whipple Mountains
Jones Valley	99	White Mountain City
Jones Valley	100	Whitewater Canyon
Jones Valley	101	Willow Creek
Jones Valley	102	Yankee Jim
Jones Valley	103	Yuba Basin

RETI Competitive Renewable Energy Zones (CREZ)

- CREZ Boundary
- Proposed Wind Project
- Proposed Solar Project
- Collector Line
- Biomass Project
- Geothermal Project

BLM Lease Application

- Solar
- Wind

RETI Transmission Segments

- New Right of Way
- Existing / Expand

Substations

- Existing
- Proposed

Prohibited, Restricted & Limited Lands

- Category I Lands - Energy Development Prohibited or Restricted by Policy
- Category II Lands - Some Energy Development May Be Possible With Significant Limitations

Land Use

- California State Park
- State Owned Land
- Bureau of Indian Affairs
- Bureau of Land Management
- Department of Defense
- Private Land
- Citizen's Wilderness Inventory
- Potential Desert Wilderness
- Williamson Act
- NOTE: Williamson Act is Imperial, Orange, Santa, San and Santa Barbara Counties not available
- The Wildlands Conservancy
- Area of Critical Environmental Concern
- Mohave Ground Squirrel Core Population
- Mohave Ground Squirrel Range

Wildlife Linkage

- South Coast Missing Linkages
- Joshua Tree - Twenty-nine Palms Linkage

Utility Ownership

- Imperial Irrigation District
- Los Angeles Dept. of Water & Power
- PacificCorp
- Pacific Gas & Electric
- Sacramento Municipality Utility District
- San Diego Gas & Electric
- Southern California Edison
- Western Area Power Administration
- All Others

Existing Transmission Lines
(Colorized according to Utility Ownership)

- 110 kV - 161 kV
- 220 kV - 287 kV
- 345 kV - 500 kV
- 345 kV - 500 kV DC

Cultural Resource Constraints

- Historic U.S. Route 66
- Sensitive Area

Federal Energy Corridors

- 368 Transmission Corridor
- Bureau of Land Management Energy Corridor

Other Features

- Road
- County Boundary
- Dry Lake Bed
- Water Body
- Disturbed Area
- BLM Solar Energy Study Zones
- Proposed National Monument
- Proposed Desert Protection
- WLD - Wilderness
- NOHV - National Off-Highway Vehicle Recreation Area

ARRA Project Labels

- BLM Project
- Joint BLM-CEC Project
- CEC Project
- Local Project

